AmerenUE
Callaway Plant

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March 7, 2005

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Stop P1-137
Washington, DC 20555-0001

ULNRC-05124

Ladies and Gentlemen:

DOCKET NUMBER 50-483
CALLAWAY PLANT UNIT 1
UNION ELECTRIC CO.
FACILITY OPERATING LICENSE NPF-30
RESPONSE TO GENERIC LETTER 2004-02: "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY RECIRCULATION DURING DESIGN BASIS ACCIDENTS AT PRESSURIZED-WATER REACTORS"

Enclosed is the Union Electric Company (AmerenUE) response to NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors." Within 90 days of the date of the NRC safety evaluation report providing the guidance for performing the requested evaluation, the generic letter requires licensees to provide information regarding their planned actions and schedule to complete the requested evaluation.

Attachment I to this letter provides AmerenUE's 90-day response to the requested information. Attachment II lists AmerenUE's commitments contained in this letter. AmerenUE will also provide the information requested by Part 2 of the generic letter by September 1, 2005.

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If you have any questions concerning this matter, please contact Mr. Keith Young at (573) 676-8659, or Mr. Dave Shafer at (314) 554-3104.

Sincerely,

Tod A. Moser
Manager, Plant Engineering

Attachments: I – 90 day Responses
II - List of Commitments

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STATE OF MISSOURI)
) SS
COUNTY OF CALLAWAY)

Tod A. Moser, of lawful age, being first duly sworn upon oath says that he is Manager, Plant Engineering for Union Electric Company; that he has read the foregoing document and knows the content thereof; that he has executed the same for and on behalf of said company with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

By _____
Tod A. Moser
Manager, Plant Engineering

SUBSCRIBED and sworn to before me this 7th day of March, 2005.

Terra E. Guittar
TERRA E. GUITTAR

TERRA E. GUITTAR
Notary Public-Notary Seal
State of Missouri, Callaway County
My Commission Expires
May 13, 2006

**90-Day Response to NRC Generic Letter 2004-02,
Potential Impact of Debris Blockage on Emergency Recirculation during
Design Basis Accidents at Pressurized-Water Reactors**

Below is AmerenUE's response to NRC issued Generic Letter 2004-02, Potential Impact of Debris Blockage on Emergency Recirculation during Design Basis Accidents at Pressurized-Water Reactors. The generic letter's "Requested Information" is shown in bold followed by AmerenUE's response.

NRC Requested Information 1

Within 90 days of the date of the safety evaluation report providing the guidance for performing the requested evaluation, addressees are requested to provide information regarding their planned actions and schedule to complete the requested evaluation. The information should include the following:

NRC Requested Information 1(a):

[Provide] A description of the methodology that is used or will be used to analyze the susceptibility of the ECCS and CSS recirculation functions for your reactor to the adverse effects identified in this generic letter of post-accident debris blockage and operation with debris-laden fluids identified in this generic letter. Provide the completion date of the analysis that will be performed.

AmerenUE Response 1(a):

AmerenUE plans to analyze the susceptibility of the emergency core cooling system (ECCS) and containment spray system (CSS) recirculation functions for the Callaway plant to the adverse effects of post-accident debris blockage and operation with debris-laden fluids identified in the Generic Letter 2004-02 using the guidance of Nuclear Energy Institute (NEI) document titled *"Pressurized-Water Reactor (PWR) Sump Performance Methodology,"* dated May 28, 2004 which was approved and supplemented by the NRC in SER dated December 6, 2004. The sump performance methodology and the associated NRC SER have been issued collectively as Nuclear Energy Institute Report NEI 04-07 (Reference 1).

The current licensing basis for Callaway as well as plant-specific features may identify exceptions and/or refinements to be taken to the guidance given in NEI 04-07. There are no exceptions or refinements identified at this time. Additional data from ongoing research on specific issues such as downstream effects, chemical effects, and coatings may also impact the methodology and guidance described in NEI 04-07. All exceptions or refinements to the guidance given in NEI 04-07, should they be taken, will be identified and a basis for them documented in the completed analysis. This analysis is scheduled to be completed by September 1, 2005.

NRC Requested Information 1(b):

[Provide] A statement of whether you plan to perform a containment walkdown surveillance in support of the analysis of the susceptibility of the ECCS and CSS recirculation functions to the adverse effects of debris blockage identified in this generic letter. Provide justification if no containment walkdown surveillance will be performed. If a containment walkdown surveillance will be performed, state the planned methodology to be used and the planned completion date.

AmerenUE Response 1(b):

AmerenUE performed a containment walkdown surveillance in November 2002. The walkdown performed was consistent with the intent of the guidance given in Nuclear Energy Institute Report NEI 02-01 (Reference 2). However, AmerenUE recognizes the benefit of performing supplemental walkdowns to collect additional information that could be useful to support the analysis of the ECCS and CSS recirculation functions.

A containment coatings walkdown assessment will be performed using NEI 02-01 guidance to provide a current assessment of Callaway's comprehensive coatings program to support the analysis of the ECCS and CSS recirculation functions. This walkdown will be completed prior to restart from Callaway's fall 2005 refueling outage currently scheduled in November 2005.

A containment walkdown assessment will be performed using NEI 02-01 guidance to provide a current assessment of dirt, dust and lint to support the analysis of the impact of this debris source on post-accident sump performance. This walkdown will be completed prior to restart from Callaway's fall 2005 refueling outage currently scheduled in November 2005.

References

1. Pressurized Water Reactor Sump Performance Evaluation Methodology, NEI 04-07, Revision 0, Nuclear Energy Institute, 1776 I Street N. W., Suite 400, Washington D.C., December 2004
2. Condition Assessment Guidelines: Debris Sources Inside PWR Containments, NEI 02-01, Revision 1, Nuclear Energy Institute, 1776 I Street N. W., Suite 400, Washington D.C., September 2002

LIST OF COMMITMENTS

The following table identifies those actions committed to by AmerenUE in this document. Any other statements in this document are provided for information purposes and are not considered commitments. Please direct questions regarding these commitments to Mr. David E. Shafer at (314) 554-3104.

COMMITMENT	Due Date/Event
1. AmerenUE will provide Part 2 of the information requested in Generic Letter 2004-02 to the NRC.	September 01, 2005.
2. AmerenUE will perform an analysis of the susceptibility of the Emergency Core Cooling System and Containment Spray System recirculation functions to the adverse effects of post-accident debris blockage and operation with debris-laden fluids.	September 01, 2005.
3. AmerenUE will perform a containment coatings walkdown assessment using NEI 02-01 guidance to provide a current assessment of Callaway's comprehensive coatings program to support the analysis of the ECCS and CSS recirculation functions.	Prior to restart from Callaway's fall 2005 refueling outage currently scheduled in November 2005.
4. AmerenUE will perform a containment walkdown assessment using NEI 02-01 guidance to collect information on dirt, dust and lint to support the analysis of the impact of this debris source on post-accident sump performance.	Prior to restart from Callaway's fall 2005 refueling outage currently scheduled in November 2005.